THE NATIONAL INTERAGENCY COMPLEX INCIDENT MANAGEMENT ORGANIZATION STUDY

FINDINGS AND RECOMMENDATIONS

OCTOBER XX, 2003

CONTENTS

"The management of wildland fire and the forces required to do this job effectively represent a core business of the wildland agencies; it is the script of our signature.

Perhaps in the past, as stated in Fire on the Mountain and other reports, we lacked the fortitude or will to make necessary changes in the program to ensure it remains at a leading-edge level."

Policy Implications of Large Fire Management:
A Strategic Assessment of Factors Influencing
Costs – A report by the Strategic Overview of
Large Fire Costs Team
January 21, 2000

Executive Summary

In March 2003 the National Wildfire Coordinating Group (NWCG) chartered a Management Options Team to examine organizational alternatives that balance local resource management work and complex incident management responsibilities. The team is soliciting input from agency administrators, wildland fire executives, and interested parties.

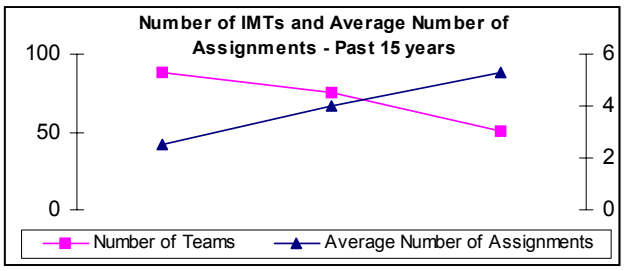
In January 2000, *An Agency Strategy for Fire Management* was completed, which recommended the Forest Service create a Large Incident Management Organization (NIMO) to "more effectively, efficiently and successfully posture itself for the future". Little was done with this report until early 2003 when based on impacts associated with the 2002 fires; the National Wildfire Coordinating Group (NWCG) chartered an interagency National Incident Management Organization (NIMO) Management Options Team to:

- Review *An Agency Strategy for Fire Management* report.
- Evaluate alternative implementation strategies for the National Incident Management Organization and the Full Agency Participation options referred to in this report.
- Develop recommendations and evaluate the ramifications, impacts, feasibility, costs and effectiveness of implementing the report's actions.
- Develop specific implementation options available to the interagency fire community.
- Ensure that these recommendations and implementation options meet overall agency resource goals and objectives, the Federal Wildland Fire Management Policy, and the National Fire Plan.

Background

Over the past ten years, a number of internal reviews and reports have been completed by land management agencies, Congressional subcommittees, GAO, OMB and the National Academy of Public Administration. These reviews continue to point out that public lands are at risk and express concern at the rising expense of protecting them. Major cultural and demographic changes in the work force, and programmatic changes in the agencies have resulted in increased costs and a reduction in agency workforce participation on large incidents. The competing workload of simultaneously meeting fire program management and resource management objectives on the home unit, while meeting the needs of complex incident management has brought the agencies to a strategic crossroads.

During the past 15 years the number of Type I Interagency IMTs decreased 10% and Type II Interagency IMTs decreased 50%. All Type I and Type II IMTs have been committed at the same time 10 of the last 25 years. The use of Interagency IMTs has increased from 2.5 assignments (pre 1998) to 4.0 assignments (1994 to 2003) and to 5.3 assignments in 2003. Today an average of 6000 overhead positions are deployed each year for an average of 60 days each in support of complex incident management.



Over the next five years, the Interagency Type 1 and Type 2 Incident Management Teams and Area Command Teams will turn over 92% of their Command and General Staffs (473 of 512 positions) due to retirements, tenure, or inability or unwillingness to participate.

The NIMO Study offers agencies with wildland fire responsibilities a clear choice in both leadership and management of complex incident management.
Choosing a "non-NIMO" option will either fail to improve complex incident management or will result in many years of implementation because of the evolution of policy changes proposed. The unknown realities of response to the National Response Plan, and the increasing workload in wildland fire responses, coupled with the declining numbers of qualified people to staff IMT's in a volunteer militia management philosophy, may create a Federal Wildland Fire Service or the Homeland Security Agency may seize a lead nationally in all complex incident management needs for the future, including wildland fires.

The NIMO Options offer an opportunity to change management philosophy in how agencies conduct their complex incident management business. The NIMO Options, as written offer specifics in numbers and costs. The reality will be if a NIMO Option is chosen, the leadership will organize NIMO personnel to follow an adaptive management philosophy to be responsive to all complex incident management needs in the future and provide resources to the agencies for land management activities (fuels) and support fire program management needs.

In the past decade, there have been two revisions of the Federal Fire Policy; A National Fire Plan has been implemented with approximately 2 billion dollars in additional funding and the employment of thousands of additional firefighters; A Wildland Fire Leadership Council has been formed; and an interagency strategy to reduce wildland fire risks in the environment has been developed. We have witnessed five years of "mega-fire" occurrences, which have exceeded our ability to mobilize and to develop a strategy to effectively manage these fires. We have experienced a terrorist attack on our homeland. An average of 25 wildland firefighter fatalities has occurred from all associated causes annually over the last ten years. Each of these events has affected the management of our public lands and our response to complex incident management.

It is imperative that the Federal Wildland Fire Agencies partner with the Department of Homeland Security for support of NIMO Options.

THE NIMO MANAGEMENT OPTION TEAM TASK

The NIMO task is focused on the issues associated with complex incident management. While we need to continue to improve our application of incident management organization and tactics, the strategic goal still remains improving the condition of the nation's public lands.

The team has factored into the analysis concern about fire leadership. Those concerns deal with the competing priorities in providing leadership:

(1) On the local units and at State/Regional/National levels
(2) Relating to complex incident management
(3) Relating to the natural resource management work of agencies
(4) Relating to all risk incident support

THE TEAM HAS DEVELOPED BROAD STRATEGIC ALTERNATIVES GENERALLY DESCRIBED AS:

- No action – current situation
- Enhanced current situation
- Three variations of NIMO
- Increased capacity of all agencies

All alternatives have the following in common:

- Assume commitment of additional resources (people & money) to the complex incident management arena and significantly enhanced priority for incident management support in the natural resource management agencies through new policy.
- Focus on change.
- Will require enhanced contracting emphasis.
- Work within the confines of an increasing, but not pre-eminent, role in non-wildfire emergency.

The NIMO Team believes a model of strong local forces built on the strength of interagency cooperation, is a fundamental basis for the future. The success of any of the alternatives is predicated on the local ability to effectively manage Type 3 complexity incidents with strong Interagency T3 Incident Management Teams. Success also relies on the ability to quickly and efficiently mobilize, deploy, manage, and demobilize interagency Type 1 & 2 Incident Management, and Area Command Teams.

Success in a selected option will result in:

- More person-days available to do local natural resource management project work
- Improved initial attack and extended attack.
- Improved integration and leadership in the area of fire, fuels, and vegetation management
- A safer and more cost effective complex incident management program

The objective is to have a consensual interagency decision ready to implement in FY05.

Without making significant organizational changes, the agencies will fail at the overall strategic goal of managing the changing conditions of our Nation's public lands. The time has come to go beyond reports and data and listen quietly to the words of John Maclean in *Fire on the*

*Mountain; "...*perhaps we lack the fortitude or will to make the necessary program changes to ensure it remains at a leading-edge level."

CHAPTER ONE – INTRODUCTION

"Staggered by an enormous deficit, horrific losses of natural resources and human life, the Forest Service must make a valiant effort to strengthen its resolve and address the issue of fire."

Missoulian newspaper article, 1911

"Like the issue of slavery, the United States must resolve this issue of fire. We can no longer avoid the fact, we must deal with it, and now."

Gifford Pinchot—Chief of US Forest Service, 1911

From the July 12, 2000 'An Agency Strategy for Fire Management, A Report from the National Management Review Team, USDA Forest Service':

1. ***The Forest Service fire and fuels program is not well integrated with the land management program of the agency.***
2. ***In some instances, line and staff officer relationships regarding fire management are ineffective.***
3. ***The Forest Service's ability to provide adequate support to large fires is diminishing.***
4. ***Many cooperators and partners think the Forest Service is ineffective and inefficient in fire management.***
5. ***The agency should adopt and implement the Large Incident Management Organization (NIMO) to more effectively, efficiently, and successfully posture itself in the future.***

These five problems are chronic. They have been identified over and over in many reviews in this decade. The four problems need immediate resolution. It is time for a change.

I Purpose and Need for This Study

In 1999, the Chief of the Forest Service commissioned an initial review team to examine several issues concerning the agency's fire management program. The report from this effort *An Agency Strategy for Fire Management* is known informally as *"The Jacob's Report."*

In January 2003, The National Wildfire Coordinating Group (NWCG) charted the interagency National Incident Management Organization (NIMO) Management Options Team to:

- Review *An Agency Strategy for Fire Management* report.
- Evaluate alternative implementation strategies for the National Incident Management Organization referred to in this report.
- Develop recommendations and evaluate the ramifications, impacts, feasibility, costs and effectiveness of implementing the report's actions.
- Develop specific implementation options available to the interagency fire community.
- Ensure that these recommendations and implementation options meet overall agency resource goals and objectives, the Federal Wildland Fire Management Policy, and the National Fire Plan.

The ability of state and federal wildland fire agencies to meet both natural, cultural resource and fire program management objectives and to provide adequate emergency complex incident management is becoming increasingly difficult. The same skilled people who are needed to manage incidents already have critical full time jobs on their home units. During an increasing period of the year these competing interests are creating increased tension for employees and supervisors for selecting jobs which will not be accomplished. This study looks at organizational options to meet incident management needs while reducing the impact to state and federal natural resource employees. A key objective of this study is to analyze organizational options which allow the natural, cultural and fire resource management work of the local unit to proceed year-round while meeting the growing complex incident management demands.

Given the condition of the forests and rangelands, we can expect the incidence and severity of "Mega Fires" to increase until major accomplishments occur in landscape fuels management. To meet the needs of complex incident management in these situations a change in the protocols and procedures is needed for the management of Interagency Incident Management Teams.

Homeland Security Presidential Directive -8 States, "The head of each Federal department or agency shall undertake actions to support the national preparedness goal, including adoption of quantifiable performance measurements in the areas of training, planning, equipment, and exercises for Federal incident management and asset preparedness, to the extent permitted by law. Specialized Federal assets such as **teams, stockpiles, and caches shall be maintained at levels consistent with the national preparedness goal and be available for response activities as set forth in the National Response Plan"…**

II Project Objectives

1. Develop and evaluate organizational options to:
    - Meet natural, cultural and resource management objectives on the local unit.
    - Meet the needs for complex wildland incident management including non-fire incidents.
    - Improve interagency cooperation in initial and extended attack and complex incident management.
2. Based on the evaluation of organizational options, develop a preferred strategic recommendation.
3. Improve quality and effectiveness fire management programs on the local unit.

Characteristics Common to All Organizational Options

All of the organizational management options (except for Option 1) displayed in this report:

- Assume that a sustainable number of Type I, Type II and Area Command teams will be available for use for both wildfire and non-wildfire emergency use throughout the calendar year.
- Work within the confines of an increasing—but not preeminent role—non-wildfire emergency scenario. (The federal wildland fire management agencies' role is, when needed, to support these incidents while they continue to focus on their traditional resource management missions. Their role also includes teaching and instructing others in incident management.)
- Assume:
    - Commitment of additional resources (people and funding) to the complex incident management arena.
    - A significantly enhanced priority for complex incident management in the natural resource management agencies through new policies.
- Focus on change.
- Will require enhanced contracting emphasis such as;

- Add Contracting Officer skills to support incident contract needs and the contract infrastructure.
- All contracts will be "best values" and "indefinite quantity"contracts.

- The ability to improve the accountability for complex incident management and other related tasks.

III Background

The following prior reports all emphasized the need to improve the complex wildland fire management organization system:

- The *USDA Forest Service An Agency Strategy for Fire Management: A Report from the National Management Review Team* (Jacobs's Report).
- *Policy Implications of Large Fire Management: A Strategic Assessment of Factors Influencing Costs – A report by the Strategic Overview of Large Fire Costs Team* (Rains Report).
- *Interagency Management Review Team, South Canyon Fire, Federal Wildland Fire Policy I and 2.*
- *The Federal Wildland Fire Policy I and II*
- *Additional Actions Required to Better Identify and Prioritize Lands Needing Fuel Reduction – GAO-03-805*
- *Wildfire Suppression: Strategies for Containing Costs, National Academy of Public Administration, "…fire programs could benefit from develping additional locally committed Type 3 organizations consisting of federal and local firefighters who are not committed to serving on Type 1 or 2 teams"*
- *Failure to successfully manage the Incident Management Program will add further evidence to those who say the Resource Management Agencies are no longer capable of managing the Wildland Fire Program.*

A. Supply and Demand

Demand for IMTs is increasing as Their Availability Decreases

Suppression costs add up to hundreds of millions of dollars each year for the complex incidents assigned to interagency wildland fire Incident Management Teams. In years 2000 through 2003 suppression costs exceeded a billion dollars annually.

In support of the National Response Plan (NRP) (under the Department of Homeland Security), current Incident Management Teams are becoming more involved with non-traditional management activity. With increasing exposure, and increasing flammability of the public lands, the public and incident management personnel's safety risks are increasing each year because of natural fuel loading.

Ironically, the need and use of Incident Management Teams is growing while the available number of these teams is decreasing. The maximum use of teams in the past 25 years occurred in 2000 when all available Type 1 and Type 2 Interagency Incident Management Teams, Area Command Teams, most Fire Use Management Teams (FUMT), most state incident management teams, and three Canadian Incident Management Teams, were all committed.

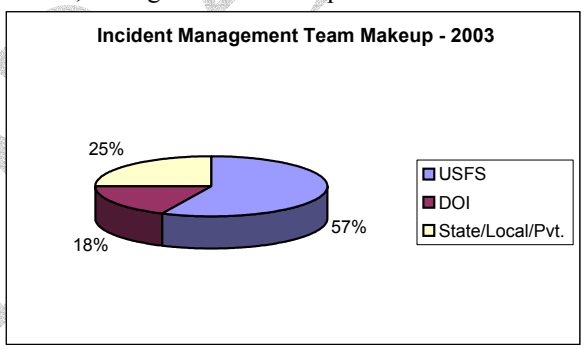
All Type 1 Incident Management Teams have been simultaneously committed 10 out of the past 25 years. During this same period, all Interagency Type 2 Incident Management Teams have been simultaneously committed three different times. In four or more out of the past ten years all IMTs have been committed one time with outstanding resources

Numerous agency reports have pointed out the need for a more aggressive fuels program to improve overall forest health. Targets in fuels and vegetation management have increased significantly since 2000. Fuels management is the larger strategic objective and more attention must be focused on these vegetative management programs. The people who form, plan and accomplish these programs are the same people who are the incident managers who are frequently are on complex incidents. They cannot do both jobs.

Incident Management Team and Area Command Composition

In 2003, National Interagency Incident Management Teams were comprised of:

- 57% U.S. Forest Service.
- 18% U.S. Department of the Interior.
- 25% state, local government and private wildland fire services.



National Area Command Teams:

- 72% U.S. Forest Service.
- 22% U.S. Department of the Interior.
- 6% state.

Because of backfilling, pay structure, and union agreements, the costs of Incident Management Teams often increase as the local government participation increases.

Incident Management Team Attrition

The existing workforce and the skills mix of that workforce are insufficient to address changing fire management priorities and increased fire management complexities. Demographic trends such as an aging workforce, two-career families, changing career interests, and other factors have significantly reduced the numbers of personnel available for fire management activities, especially fire suppression and fuels management. These changes have brought the agencies to a critical decision point. If action is not taken now, the current Incident Management Team system will cease to exist simply from the shortage of qualified personnel in the agencies to staff the teams. The specific metrics of these trends are as follows:

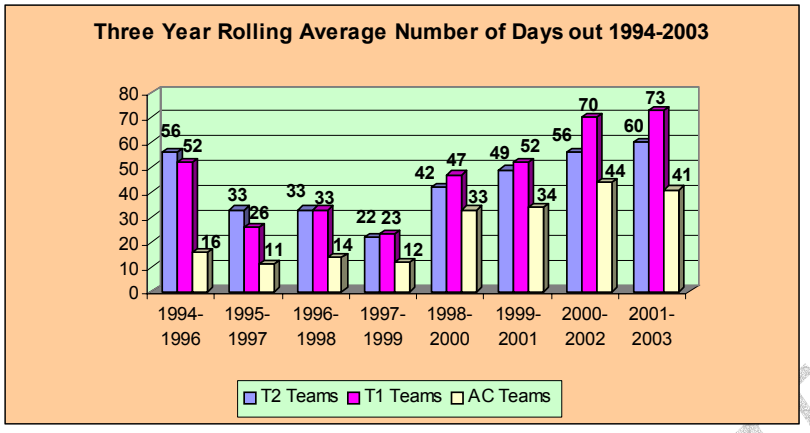
Personnel retirements within the federal and state wildland fire agencies are projected to be far above average over the next five years.

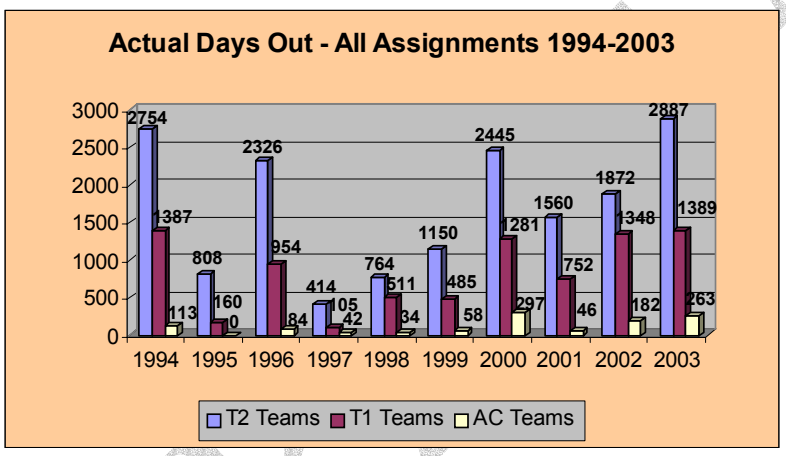
During the past 15 years, the number of interagency Type 2 Incident Management Teams and state Incident Management Teams has dropped by almost 50%. If this trend continues, national Type 1 Incident Management Teams will have an increase in workload far beyond the capabilities of the current 16 established teams.

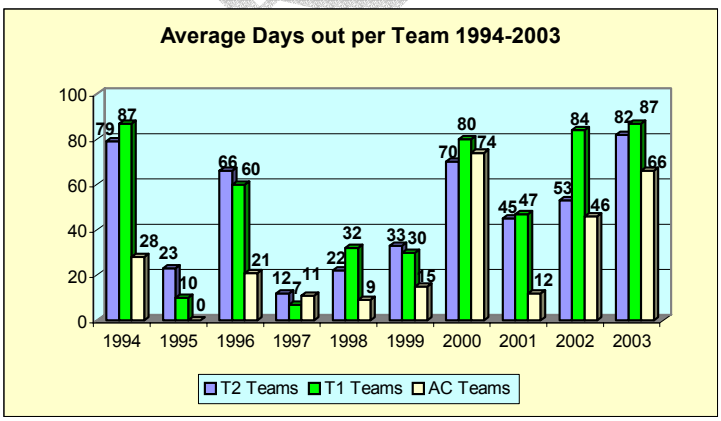
There are currently:

- 16 Interagency Type 1 Incident Management Teams
- 35 Interagency Type 2 Incident Management Teams
- 22 State Incident Management Teams
- 4 Fire Use Management Teams
- 4 Interagency Area Command Teams

From 1994 through 2003, Interagency Incident Management Teams averaged 4 assignments per year. Area Command Teams averaged 1.4 assignments per year


Three Year Rolling Average Number of Days out 1994-2003
80
70
60
50
40
30
20
10
0
56 52 16
33 26 11
33 33 14
22 23 12
42 47 33
49 52 34
56 70 44
60 73 41
1994-1996
1995-1997
1996-1998
1997-1999
1998-2000
1999-2001
2000-2002
2001-2003
T2 Teams
T1 Teams
AC Teams


Actual Days Out - All Assignments 1994-2003
3000
2500
2000
1500
1000
500
0
2754 1387 113
808 160 0
2326 954 84
414 105 42
764 511 34
1150 485 58
2445 1281 297
1560 752 46
1872 1348 182
2887 1389 263
1994 1995 1996 1997 1998 1999 2000 2001 2002 2003
T2 Teams
T1 Teams
AC Teams


Average Days out per Team 1994-2003
100
80
60
40
20
0
79 87 28
23 10 0
66 60 21
12 7 11
22 32 9
33 30 15
70 80 74
45 47 12
53 84 46
82 87 66
1994 1995 1996 1997 1998 1999 2000 2001 2002 2003
T2 Teams
T1 Teams
AC Teams

Furthermore, local and state government involvement on Incident Management Teams is currently growing while federal participation is decreasing within these interagency organizations.

Collateral duties for complex incident management compete with local duties and objectives. Employees are often needed at the same time for:

- Complex incident management assignments.
- Home unit land, natural and cultural resource management.
- Fire program management on the local unit.

Additionally, Homeland Security, through the National Response Plan, and other requests for non-wildland fire assignments have made an increasing impact on the complex incident management organizations. During the past 10 years IMT's and Area Command have averaged 9 non-wildland fire assignments per year. In 2003 there were 32 assignments.

Positions Needed to Fill Teams

The issue of team size is complex. The lack of qualified personnel at the local geographic and national level has caused the teams to either wait for the system to locate these individuals or add these positions to the teams to be fully operational on arrival at the Incident.
In recent years a tremendous increase in expectations, both internal and external has occurred. These expectations have added required positions with specialties to meet these needs.

The current combined total of 51 Interagency Type 1 Incident Management Teams, Interagency Type 2 Incident Management Teams, and Area Command Teams carry approximately 3076 positions on their standing teams (approximately 60 personnel per team).

If all the Type I and Type II Interagency IMT's were assigned at the same time—based on past usage—they would need approximately an additional 3,060 miscellaneous management or supervisory positions filled.

The 16 Interagency Type 1 Incident Management Teams and the Type 2 Incident Management Teams fill an average of 60 miscellaneous management, supervisory or support positions.

Both Interagency Type 1 and Type 2 Incident Management Teams now average one primary and one alternate Command and General Staff position filled with administratively determined (AD) hires.

- Short term solutions to personnel shortages include the effective use of highly qualified retirees though the use of the rehired annuitants. Individual agency interpretation for fire emergencies must be changed to reflect the flexibility in the law in a common way to utilize this authority to fill shortage positions, mentor personnel and provide training.

- The complication and individual agency interpretation of the ability to use contracting instruments for hiring qualified incident management personnel precludes the ability to utilize this significant pool of trained resources. This issue could be partially mitigated with an emergency pay rate system that is consistent, equitable and fair.

- Development of a Federal Wildland Reserve Program concept by:

  - Utilizing trained and qualified personnel that are no longer in the federal, state or local service that are willing to commit to availability for a prescribed period of time per year to meet emergency response position shortages. This model would be similar to the military reserve program.

  - **Key elements include:**

  - These IMT Reservists would commit for a period of three years and would be paid through the rehired annuitant authority and the AD program for state and local government during actual incident assignments and training.

  - Currency would include a commitment to refresher training and physical fitness testing as appropriate prior to issuance of qualification card. This refresher would include agency's policy changes, new procedures and new technology.

  - Utilize IQCS and ROSS to develop and maintain daily available lists for incident response and training course execution.

  - This reserve program would be available to respond regardless of preparedness level for any emergency if normal agency resources are not available. This program could also be utilized on long duration incidents to free up agency personnel to accomplish their workload at the home unit.

This concept is in concert with the roles and responsibilities outlined in "*Homeland Security Presidential Directive HSPD-7 and 8.*

Long Term Solutions through Training and Development:

The Agencies are experiencing a major shortage of qualified personnel to meet Incident Management requirements. This is due to a period of agency flat budgets, very few new hires, conflicting work activities and in some cases reductions if force. This period of time was in excess of 15 years followed by an increase in new hires as a result of the National Fire Plan. The consequence is a gap between recent hire qualifications and a continuous high rate of retirements over the next few years. The diminishing qualified training cadre, lack of available instructors, and available students to attend courses has caused course cancellations in many areas.

The additional Forest Service training requirements and unique task book protocols greatly slows the qualification progression for FS employees. This is contributing to the current erosion of

forest service participation on IMT's and will increase as current highly qualified FS personnel retire.

The current training system is failing and will continue to fail to meet the needs for qualified incident management personnel.

To solve this problem the following must occur:

- Standard training requirements by all agencies must be at the forefront.
- Amend the current training program to reduce redundancy.
- Repackage the training delivery system to increase the pace to meet training requirements.
- Utilize a mentoring process to facilitate trainee completion.
- Identify individuals for accelerated training and provide support and commitment to ensure this investment in training is realized.
- Agencies must commit to make students and instructors available.

Advances in technology require specialist to operate and utilize these advances that may increase firefighter safety and efficiency at the incident.

Increase reliance on contract resources has added contract specialists and is compounded by the multiple contracts requiring a person with warrants to manage these different contracts.

Within the last 5 years the incidence of the "Mega Fire" has increased to the magnitude of multiple per year. These incidents are of extremely high complexity requiring a strong reliance on overhead personnel to accomplish the tactical and support mission.

The mentoring and development of future Incident Management Teams has added trainee positions.

As Department of Homeland Security's training and certification system evolves, equivalencies between the systems and course development will have to be accomplished to avoid duplication and confusion.

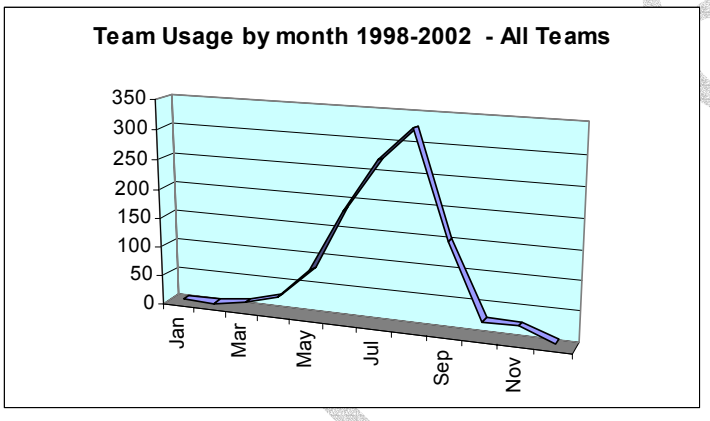
Type 1 and Type 2 Incident Management Teams are decreasing in Number

The number of Interagency Type 2 Incident Management Teams and State Incident Management Teams has decreased 50% during the past 16 years. National Type 1 Incident Management Teams have decreased 12% during this same period of time—due primarily to retirements and lack of available personnel. The trend for decreasing teams is expected to continue.

Needs Analysis

The NIMO Task Group gathered information on Type I and II Interagency IMT's, Fire Management Use IMT's and Area Command use for the period from 1994 through 2003. The data was not included for the 22 state IMT's since their mission is to meet state responsibilities and not the needs of the federal or local government incident management. The National MAC Group requested that the NIMO Task Group develop the maximum amount of Type I and II Interagency IMT and Area Command days use per year per team. We then adjusted the number of teams needed to meet the average number of days that teams are assigned from the needs analysis data..

The following chart shows team usage over the past five years



Support of Wildland Fire Assignments

Increasing time commitments have caused supervisors to not support their employees' involvement with wildland fire incidents and fire training and non-wildland fire assignments off units. The competition for individuals' time to accomplish both natural and cultural resource management and local fire and aviation management duties and complex incident management assignments has created this perception of non support. This perception of non-support stems from the competition for an individual's time to accomplish:

- Land and natural and cultural resource management duties.
- Local fire program management duties.
- Complex incident management assignments.

Unless this issue is resolved, the future availability of employees will decrease as non-wildland fire incident needs increase.

Incident Management Personnel Pressures

The increasing concern about environmental quality, safety, and cost effectiveness is resulting in growing pressures to perform incident management. At the same time, due to the

growing amount of ecosystems out of balance and the increasing public expectations for fire services in the wildland urban interface, the complexity of incidents is also increasing.

Turnover and Attrition

Over the next five years, the National Interagency Type 1 Incident Management Teams, Interagency Type 2 Incident Management Teams, and Area Command Teams will turn over 92% of their Command and General Staffs (473 of 512 positions) due to retirements or inability, tenure or unwillingness to participate. Consequently the availability of qualified and experienced instructors to train future incident management team members will be lost from the agencies.

If the Command and General Staff, Advanced Incident Management and Area Command (S-420/520/620) classes are structured and scheduled as in the past, the demand for new qualified Command and General Staff will not be met. This shortfall will be even more severe because of state and local government incident management needs.

In addition, due to agency field unit reorganizations, fewer fire management leadership positions are staffed today. This results in less people being available for key positions on Incident Management Teams.

Factors that Contribute to the IMT Personnel Supply and Demand

- There is no available model to identify complex wildland fire needs.
- The National Fire Plan has increased the number of fire-funded personnel. However, new employees are young and will not be qualified in command and general staff positions for another decade.
- The number of wildland fires managed by Fire Use Management Teams is increasing.
- Past reviews and reports have identified the need to strengthen initial and extended attack to reduce the use of Type 1 and 2 Incident Management Teams.
- Agency Administrators are requiring more fire management personnel to stay home because of increasing concerns about costs, safety, workload complexity, and accountability.
- Demographic trends such as an aging workforce, two-career families, changing career interests, and other factors have significantly reduced the numbers of personnel available for fire suppression activities.

- The general downsizing of federal agencies with fire management activities has led to fewer people to meet annual fire season staffing requirements.

- Cultural changes within the agencies and the employees that make up the current workforce. Today's workforce no longer has roots in a rural background, coming primarily from an urban setting where values do not coincide with the attributes associated with incident management (such as "camping out"). This is compounded by shifts in agency expectations of employees. For example, the expectation that all personnel will participate in fire or other emergency response no longer exists (while still in agency manuals, such as Forest Service Manual chapter 5100, it is no longer enforced).

- Due to the changing personal values and off-the-job impacts, many employees are now only available for local fire assignments.

- Agency culture has also changed in relationship to the importance of employee involvement with Incident Management Teams. An example of this phenomenon: the common standard of discouraging Agency Administrator participation on Incident Management Teams and not valuing the experience gained as a career enhancing assignment..

- Increased use of IMTs for DHS deployment and support during National Disasters

- Increased use of IMTs for non-fire activities i.e. Newcastle Disease, Space shuttle, etc.

- Decreasing number of people to be trained.

By 2006 the Federal agencies will be unable to provide sufficient, viable volunteer militia unless options 2,3,4, or 5 are implemented. If the policy changes proposed in these options are not adopted, only a Federal Wildland Fire Service will provide a satisfactory option for complex incident management.

Where Have all the Firefighters Gone?

From the February 2001 'Where Have all the Firefighters Gone' by the Brookings Institution for the National Wildfire Coordinating Group:

- ***Availability and interest in fire assignments is driven by a number of factors, including workload priorities and loss of manpower.***
- ***Fire is still respected and admired in the Forest Service, but most people don't have time to participate.***
- ***Non-fire functions have created other niches. These local programs and projects take precedence over national concerns.***
- ***Time for family and social life is important to personnel and there is no monetary incentive to work a fire.***
- ***The focus on fuels management and working with others has led to a positive land stewardship approach.***

Background

B. Standards and Oversight

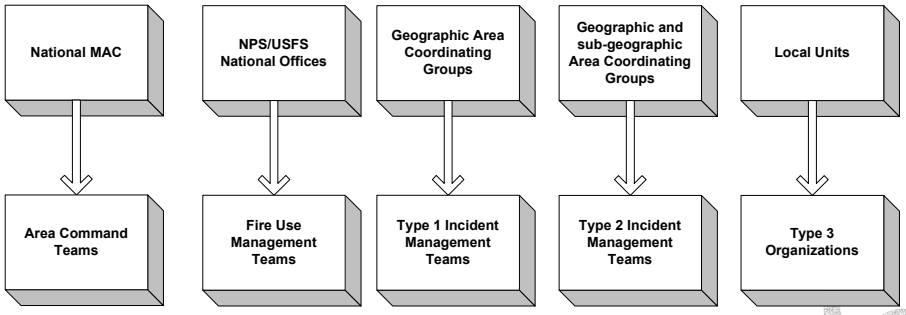
All oversight and most standards establishment are determined by:

- Geographic areas for Interagency Type 1 Incident Management Teams.
- Geographic or sub-geographic areas for Type 2 Interagency Incident Management Teams.
- The National Multi-Agency Coordination Group for Area Command Teams.

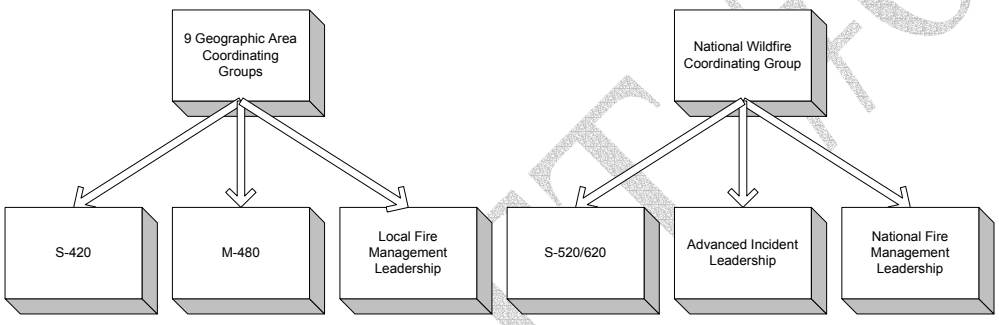
No Common Linkage

The entire support and oversight system for Interagency Type 1 and Type 2 Incident Management Teams, Area Command Teams, and the S-420, S-520, and S-620 training programs have no common link.

A significant amount of time and effort is spent by the agency's employees to reconcile these issues. Even so, these classes and teams all depend on common standards and the availability of people to be successful in meeting agency and public objectives of complex incident management. Incident Management Team oversight:



Training Oversight:



No agency has accepted the authority or responsibility to require their agency—or geographic areas—to provide the needed number of personnel assigned to the incident management organizations.

National Fire Plan

Standards Vary Between Geographic Areas

The use of ADs in Command and General Staff positions and the number of Operations Section Chiefs allowed on a team are examples of standards that vary between geographic areas. The geographic areas each defend their standards as being correct because they believe they are more cost efficient and safe.

Team Size and Makeup: A Continuing Issue

Team size and makeup is a continuing issue between the agencies and Incident Commanders. Incident Commanders do not have confidence in personnel availability to fill miscellaneous

supervisory, management and support positions. Therefore, they expand their standing teams to meet all perceived needs for these miscellaneous positions.

No IMT Standards

Oftentimes, host Geographic Coordination Groups do not recognize out-of-geographic-area Incident Management Team standards, or team standards direction given by the National MAC Group.

For all levels of government to respond to both wildland fire and non-wildland fire incidents, the legal authorities and processes must be improved and made uniform, especially in light of *Homeland Security Presidential Directive number 5*.

Failure to Evaluate National Needs, Accept Authority

There is no group responsible to evaluate the national needs for all types of incident management organizations. Likewise, no agency has accepted the authority or responsibility to require their agency—or geographic areas—to provide the needed number of personnel assigned to the incident management organizations.

The Type 1 and 2 Interagency Incident Management Teams are truly in place to meet the interagency needs of all geographic areas, therefore, should be uniform in operating procedures and policies.

The following must be accomplished to successfully achieve the goals as outlined in the options.

- National MAC team oversight
- National management of rotation to stay consistent with the new **60 days commitment policy.**
- National coordination of the type 2 teams to management the **60 day commitment** for Type 2 teams and miscellaneous overhead.

Efficiency of Teams - Processes and Positions

Incident business processes have remained relatively unchanged for the past 20 years. Millions of dollars are spent on uncoordinated agency specific, functionally independent applications and processes. The lack of standardization of incident base information management tools interferes with the ability of Incident Management Teams to reliably utilize and share the same data and software everywhere as personnel or incidents transition and change. In addition, with the President's "e-gov" initiatives, there is incentive to provide tools that can be utilized by multiple agencies for post-incident activities (i.e. paying bills, processing time, upward reporting etc.).

The Incident Base Automation Strategic Planning Project (Incident Base Automation - Phase 2) will identify high level needs for changes to or elimination of current incident practices that may or may not be currently automated as well as the interconnectivity requirements between the various incident management functions. Implementation of the

recommendations made from this project (due in 2005) will improve efficiency and may affect the number and kind of positions required on Incident Management teams.

Chapter Two – Context for Analysis of options

1. The same number of overhead positions will be needed in the future for incidents.

2. To efficiently use private wildland fire services personnel, all agencies must develop a common definition of inherent government functions and standardize payment rates and contracts. . See the Federal Wildand Fire Agencies Reserve program on page 16.

3. All NIMO positions are funded and staffed for 260 days. All volunteer militia, state and local government and private wildland fire services positions are funded and planned based on 60 days of complex incident assignments.

4. The cost of all positions is based on $500.00 per day. This over-programmed rate for NIMO and volunteer militia positions would cover any funding shortages caused by the $500.00 daily rate for state, local government and private wildland fire service employees and administrative costs for NIMO employees.

5. All NIMO Incident Management Teams will respond to non-wildland fire incidents and can meet the full magnitude of Department of Homeland Security assignments. Geographical Area sponsored Incident Management Teams will respond to local State Response Plan emergency assignments.

6. The use of the term "contract" is all-inclusive and comprises: rehired annuitants, Administratively Determined hired (ADs), and formal contracted wildland fire services. Agreements would be established with state and local governments who elect to provide personnel.

7. All federal agencies will use the same incident qualification and certification system (NWCG 310-1). Private wildland specifications will require similar equivalent NWCG 310-1 standards.

8. There are no longer federal agency savings because suppression expenditures are now being totally covered by the agencies out of appropriated funds.

9. Private wildland fire services, state and local government and federal volunteer militia members will be in training or on assignment 60 days per year.

10. Option one in Chapter four is the baseline for measurement of costs, effectiveness and efficiency.

11. All options, other than Option 1, will use incident size, type and complexity to determine IMT configuration for the response to an incident. Long IMT's will no longer respond to all incidents.

12. National Response Plan direction will be met by both U.S. Department of Agriculture and the U.S. Department of the Interior.

13. Geographic or sub-geographic areas will establish Type 3 Interagency Management Teams consistent with the direction and Standards in the Inter-agency Fire Operations Handbook, Chapter 10, Incident Management organizations and standards. This is in line with the new direction from DHS to local government.

14. Excellent leadership must be exhibited to establish any NIMO alternative.

15. Service First "C*oncept of Operations"* will be used with any selected NIMO alternative. Will follow the Service First Concepts in the development of standard direction policies and guidelines.

.

16. Incident Management Teams, modules staffed by agency rehires, or the private wildland fire services may be used for selected non-wildland fire incidents. These same resources may help agencies such as FEMA, APHIS, NASA and the Department of Homeland Security for development of their own Incident Management Teams. This would enable agency personnel to stay home to pursue their regular jobs.

17. The use of rehired annuitants will maximize the use of retirees to fill positions that the agencies and private wildland fire services are unable to fill.

18. Volunteer militia are used in all options. Commitment to incident management support and training will be required. This would include recognizing potential fire management "stars" who would receive accelerated training, mentoring and job experience to advance rapidly in the fire program.

19. We must offer incentives to personnel for participating on Incident Management Teams. These include:

    - Offer cash incentives for committing to three years as a member of an Incident Management Team.
    - Change career development and promotion selection processes to require a background in incident management to be considered, especially for line positions.
    - Change current pay rules to allow overtime from incident participation to count toward the "high three" in computing retirement annuity.

20. Agency policy must be changed so that all employees are required to participate or support the incident management program.

21. Offer federal funded Intergovernmental Personnel Act (IPA) positions to state and local government agencies to fund their involvement in NIMO.

22. To efficiently use private wildland fire services, agency attitudes and processes for contracting must dramatically change.

23. Finance/Administrative Sections on Incident Management Teams will provide much of the NIMO administrative support.

24. Working agreements will be used for Incident Management Team members to help evaluate performance for non-incident assignment work.

25. Use Incident Management Teams and selected overhead from Canada, New Zealand, and Australia for training assignments every year to reduce "start-up time" when these resources are needed in severe and extreme wildland fire years. This practice would also include an exchange/reciprocal agreement for United States mobilization with Canada, New Zealand, and Australia.

26. Assist state and local government through the use of NFPA 1051, 1561 or NWCG 310-1 qualification standards in training to help provide qualified local employees in incident management.

CHAPTER THREE – ISSUES AND CONCERNS

"Agencies should provide incentives to increase the proportion of their own employees who participate in some adjunct firefighting or fire-support activities related to large-fire suppression although their primary jobs are not firefighting."

The National Academy of Public Administration report
Wildfire Suppression: Strategies for Containing Costs
September 2002

In the beginning of the analysis process, the following issues and concerns were considered and addressed by this study's Management Options Team and Task Group.

- The increased complexity of local resource management and changing employee values has lead to the unavailability of qualified personnel for Incident Management Teams.
- The existing workforce and the skills mix of that workforce are insufficient to address changing fire management priorities and increased fire management complexities.
- The local ability to effectively supervise initial and extended attack.
- Personnel are needed for complex incident management at the same time they are needed at the home unit for fire and land and resource management responsibilities.
- Perceptions of some Agency Administrators supporting complex incident management objectives and achieving land and resource management targets are mutually exclusive.
- The current highly decentralized organizations and differing land and natural resource management agency cultures.
- The integration of fire management with other land and resource management activities.
- The ability of federal natural resource management agencies to redeem their land and natural resource management role. The linkage to all federal land management agencies' land and resource management mission is simply too important to divorce aspects of fire management and fire use from these agencies.

- The ability to provide qualified individuals to meet complex incident management needs.

- The need for training efficiency and consistency and a certification system to meet complex incident management needs.

- Determining the capability of agencies to meet future management and support of the National Response Plan.

- The ability to resolve the current limited number of Incident Management Teams for an expanding number of incidents.

- Fire suppression responsibility is becoming more and more complex, thus more costly. Suppression costs have trended upward sharply from the mid-90s to today. Over the last five years, this expansion of suppression costs has increased 200 percent.

- There are increased accountability requirements of Incident Management Teams and Agency Administrators in the area of complex incident management.

- Ensuring the safety of responders and the public.

- Increased wildland fire complexity due to accumulation of hazardous fuel across the country—coupled with an ever-increasing wildland-urban interface.

- Determining the authorities, responsibilities, liabilities, and reimbursements of an interagency National Incident Management Organization solution.

- What is the adaptability of agencies to accept organizational change?

- The administration, Office of Management and Budget (OMB), General Accounting Office (GAO), and the public, all demand a more cost effective approach to fire management.

- The severity and complexity of wildland fires are increasing across the nation. Mega-fires are an emerging issue.

- Complex wildland fire incidents have evolved into all-risk incidents (HazMat, evacuations, search and rescue, structure fires, etc.).

- The ability to maintain land and natural resource agency focus in wildland fire incidents.

- The conflicts of jurisdictional authorities and responsibilities in the interagency environment.

- The ability to utilize local non-wildland fire agencies/services to support Incident Management Teams specifically for the T3 Incident Management Teams.

- Organizational options may require multiple Employee-Union approvals.

- All options other than the current option will involve agency policy changes and may require significant human resource commitments.

- Interagency wildland Incident Management Teams are heavily relied upon for non-wildland fire incidents and support of the current Federal Response Plan.

- Few career incentives encourage participation in complex incident management.

- Parents have childcare concerns, as well as other community interests that affect availability for complex incident management assignments.

- Incident management activities are not included in position descriptions or performance evaluations.

CHAPTER FOUR – ORGANIZATIONAL OPTIONS

Options evaluated for the Complex Incident Management Organization Study are:

Option 1 - Current Organization – The current organization includes**:**

16 Type I "long" National Interagency Incident Management Teams sponsored by the nine geographic areas. These teams are on both a national and geographic rotation. The composition of these teams is approximately 75% Federal and 25% State, Local and Private Wildland Fire Services.

35 Type II "long" Interagency geographic Incident Management Teams which are sponsored by geographic or sub-geographic areas. These teams are on geographic rotation. The composition of these teams are approximately 75% Federal and 25% State, Local and Private Wildland Fire Services.

4 "short" Interagency Fire Use Management Teams sponsored by the National MAC Group and on national rotation.

4 National Area Command Teams of four people each sponsored by the National MAC Group and on national rotation.

The long teams are comprised of an average 60 people, including trainees. The short teams average 10 people. All of these teams are staffed with employees who are part of the volunteer militia system and have other full time jobs with their agencies.

There is no standard team tenure or selection process for these 55 incident management teams.

Option 2 – Enhanced Current Organization

Option 2 maintains the incident management team structure described in Option 1 but with 65 IMTs, 45 type 2 and 20 type 1 teams except FUMT workload is now part of 65 interagency IMTs. The need for 65 IMTs comes from the needs assesstment found in Appendix A with the following agency policy changes:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element). Employees who want to continue with IMT participation will be supported by their agency and local Agency Administrator.

Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary. .

Comment:

Incident Management participation is included in annual work planning. Work"missed" while an employee is away from the local unit does not get accomplished.

Option 3 – NIMO – 50% Permanently Staffed

For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

This option reduces the number of Incident Management Teams to 60 with 40 type 2 and 20 type 1 teams. 30 team members are NIMO employees with the remainder of the team positions filled with volunteer militia, State and Local government, and Private Wildland Fire Service employees. Area Command Team members (4/team) are NIMO employees.

All three Federal Agency policy changes described in Option 2:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.

Comment:

- Incident Management participation is included in annual work planning. Work"missed" while an employee is away from the local unit does not get accomplished.

Option 4 – NIMO – 10 Permanent employees/team

For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

This option has 60 Incident Management Teams with 40 type 2 and 20 type 1 teams using the NWCG "short team" configuration (10/team) as permanent employees. The remainder of the team positions are filled with volunteer militia, State and Local government, and Private Wildland Fire Service employees. Area Command Team members (4/team) are NIMO employees.

All three Federal Agency policy changes:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.
- Incident Management participation is included in annual work planning. Work"missed" while an employee is away from the local unit does not get accomplished.

Comment:

Option 5 – Type I IMTs NIMO

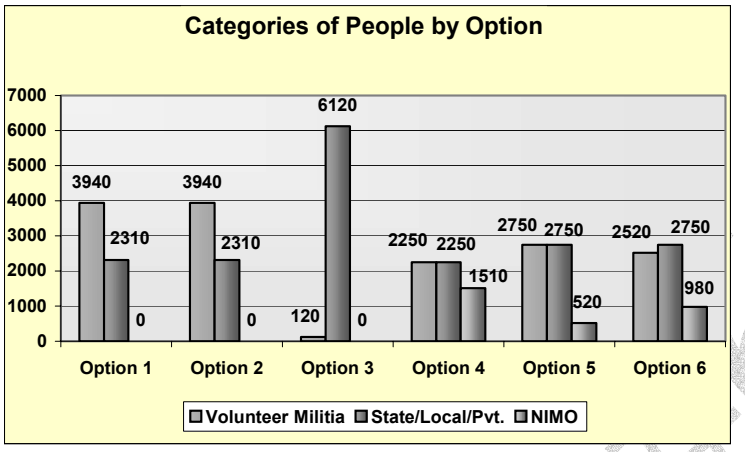
For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

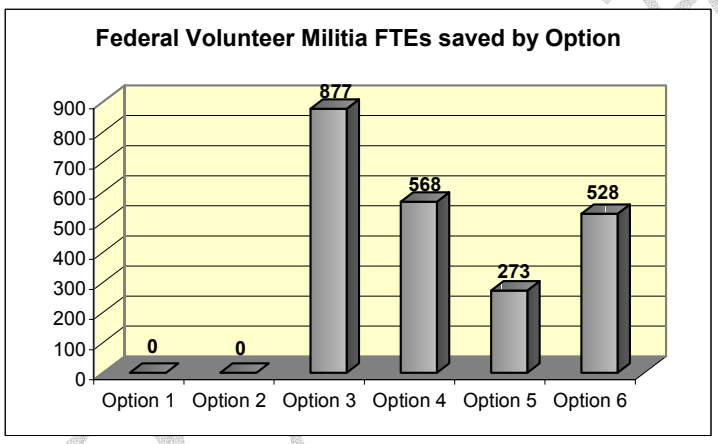
This option has 16 Type 1 Incident Management Teams with 60 NIMO employees/team. Area Command Team members (4/team) are NIMO employees. 44 Type 2 Incident Management Teams are provided by the geographic areas and are staffed by volunteer militia, State and Local government, and Private Wildland Fire Service employees (60/team).

All three Federal Agency policy changes:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.
- Incident Management participation is included in annual work planning. Work"missed" while an employee is away from the local unit does not get accomplished.

Comment:





Paul, I will get some updated charts to you early next week.
The NIMO positions in Options 3,4 and 5 provide additional flexibility to reduce the volunteer militia during non-peak IMT usage periods (October 1 to June 1).

OPTIONS

	Number of IMTs	Number of ACTs	Total FTE's	Volunteer Militia FTE's 60 days/person	Contract, State & local government FTE's	NIMO FTE's	Volunteer Militia FTE's saved
1	55	4	1268	950	318	0	0
2	65	5	1268	950	318	0	0
3	60	5	2474	327	327	1820	623
4	60	5	1616	498	498	620	452
5	60	5	1772	396	396	980	554

The success of all Options requires National MAC oversight and management of rotation and use of non-NIMO personnel to ensure compliance with a 60 day commitment.

The cost rational for each option follows:

OPTION 1

This option includes the current 51 type I and Type II interagency IMTs. Each IMT will have an average of 120 overhead when on assignment. Also included are the current 4 Fire Management Use IMTs. They each have 10 overhead when on assignment. There are also 4 Area Command Teams with 4 people per team. Volunteer militia (VM) make up 75% of all teams and private, state and local (PSL) government make up the other 25%

90VM/team x 51 IMTs =	4590 people
30 PSL/team x 51 IMTs =	1534 people
3VM/team x 4 ACTs =	12 people
1 PSL/team x 4 ACT =	4 people
8 VM/team x 4 FMUTs =	32 people
2 PSL/team x 4 FMUTs =	8 people
TOTAL	6192 people

10 year average = 329,280 IMT overhead days per year

329,280 = 54 days per year on assignment
6192

COSTS and FTEs

VM = 4634 people x 54 days x $500/day = $125.0mm
PSL = 1542 people x 54 days x $500/day = $42.0mm
$167.0mm

VM = 4634 x 54 days = 950 FTEs
260

PSL = 1542 x 54 days = 318 FTEs
260

OPTION 2

This option includes the current **6**5 type I and Type II interagency IMTs of 120 people which are 75% VM and 25% PSL. The 65 IMTs are based on the 2004 needs analysis which as the objective of non-NIMO overhead not being assigned more than 60 days per year. The workload includes 4 Fire Management Use IMTs. There are also 5 Area Command Teams with 4 people per team.

90VM/team x 65 IMTs =	5850 people
30 PSL/team x 65 IMTs =	1950 people
3VM/team x 5ACTs =	15 people
1 PSL/team x 5ACT =	5 people
TOTAL	7820 people

10 year average = 329,280 IMT overhead days per year

329,280 = 42 days per year on assignment
7820

COSTS and FTEs

VM = 5865 people x 42 days x $500/day = $123.0mm
PSL = 1955 people x 42 days x $500/day = $41.0mm
$164.0mm

VM = 4634 x 42 days = 950 FTEs
260

PSL = 1542 x 42 days = 318 FTEs
260

OPTION 3
This option includes the current **60** type I and Type II interagency IMTs. Each IMT will have an average of 30 NIMO, 45 VM and 45 PSL overhead when on assignment. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. The 2004 needs analysis displays an average of 196 IMT assignments per year and 25% or 49 of these assignments occur from October to May, these 49 assignments will be fully staffed by NIMO personnel.

30 NIMO/team x 60 IMTs =	1800 people
45VM/team x 60 IMTs =	2700 people x 75% = 2025
45 PSL/team x 60 IMTs =	2700 people x 75% = 2025
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5870 people

10 year average = 329,280 IMT overhead days per year

49 assignments by 100% NIMO = 46 days/year
147 assignments by 60 mixed IMTs = 42 days/each (NIMO employees assigned 88 days/year)

COSTS and FTEs

NIMO = 260 days x $500.day x 1820 people = $237.0mm
VM = 2025 people x 42 days x $500/day = $43.0mm

PSL = 2025 people x 42 days x $500/day = $43.0mm
$323.0mm

NIMO = 260 days x 1820 people = 1820 FTEs
260

VM = 2025 x 42 days = 327 FTEs
260

PSL = 2025 x 42 days = 327 FTEs
260

OPTION 4

This option includes the current **60** type I and Type II interagency IMTs. Each IMT will have an average of 10 NIMO, 55 VM and 55 PSL overhead when on assignment. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. Fifty percent of the 25% of assignments occur from October to May and will be staffed by NIMO personnel.

10 NIMO/team x 60 IMTs =	600 people
55VM/team x 60 IMTs =	3300 people x 80% = 2640
55 PSL/team x 60 IMTs =	3300 people x 80% = 2640
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5900 people

25 assignments by 100% NIMO = 70 days/year/person
171 assignments by 60 mixed IMTs = 49days/each (NIMO employees assigned 119 days/year)

COSTS and FTEs

NIMO = 260 days x $500.day x 620 people = $81.0mm
VM = 2640 people x 49days x $500/day = $65.0mm
PSL = 2640 people x 49days x $500/day = $65.0mm
$211.0mm

NIMO = 260 days x 620 people = 620 FTEs
260

VM = 2640 x 49 days = 498 FTEs
260

PSL = 2640 x 49 days = 498 FTEs
260

OPTION 5

This option includes 16 IMTs of **60** NIMO type I and Type II interagency IMTs. Each IMT will have an 30 VM and 30 PSL overhead and 44 IMTs of 60 VM and 50 PSL overhead. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. 25% of all assignments occur from October to May and will be staffed only by NIMO personnel.

60 NIMO/team x 16 IMTs =	960 people
30 VM/team x 16 IMTs =	480 people x 75% = 360
30 PSL/Team x 16 IMTs =	480 people x 75% = 360
60 VM/team x 44 IMTs =	2640 people x 75% = 1980
60 PSL/team x 44 IMTs =	2640 people x 75% = 1980
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5660 people

49 assignments by 100% NIMO = 86 days/year/person
147 assignments by 60 mixed IMTs = 44 days/each (NIMO employees assigned 130 days/year)

COSTS and FTEs

NIMO = 260 days x $500.day x 980 people = $127.0mm
VM = 2340 people x 44 days x $500/day = $51.0mm
PSL = 2340 people x 44 days x $500/day = $51.0mm
$229.0mm

NIMO = 260 days x 980 people = 980 FTEs
260

VM = 2025 x 44 days = 396 FTEs
260

PSL = 2025 x 44 days = 396 FTEs
260

CHAPTER FIVE – EVALUATION CRITERIA

The following criteria were used to evaluate the organizational options looking both at past and future issues and opportunities.

A. The ability to improve S**afety and risk management** for complex incident management. *(Study Objective)*

B. The ability to improve the **local unit natural and cultural resource management and fire program management objectives** of federal and state land management agencies. *(Study Objective)*

C. The ability to improve the agency's **objectives for complex incident management and non-fire**. *(Study Objective)*

D. The ability to improve **inter-agency and inter-governmental cooperation and efficiencies.** This includes the inclusion of state and local government personnel needed to accomplish an option. *(Study Objective)*

E. Agency acceptance of the organizational option. Agency is defined as the agency administrators and fire management leadership of the participating NWCG agencies.

F. Efficiently meet the direction of the **National Response Plan** in compliance with Presidential Homeland Security Directive #5-8**.**

G. The ability to improve the development of **fire leadership**, for both complex incident and fire program management development.

CHAPTER SIX – EVALUATION OF OPTIONS

A. RANKING OF OPTIONS

**KEY ASSUMPTION: In all options other than Option 1, the incident size, type and complexity will determine the response, number of team members and configuration.

Following are evaluation scoring the used for each of the options:

5 – Meets all evaluation
4 – Meets most >80%
3 – Meets most >60%
2 – Meets most >40%
1 – Meets some <20%
0 – Does not meet

Some of the options, if accepted, only address complex incident management issues that fix "yesterday's problems," but do not strategically address future issues. Some of the options fail to provide sufficient people to accomplish land and resource management objectives and fire program management objectives on the home unit. Some options offer few opportunities to improve inter-agency and inter-governmental efficiencies. The consequences of failure are that the agencies will simultaneously fail in meeting the four key project objectives.

Funding: The chart on page ** displays a comparative analysis of the cost of each of the alternatives. Factors included in determining the costs include:

- **Cost to implement**: salary to staff IMTs is the only cost used in this figure. An average $500.00 per day is used to compensate for the variability in salary costs for federal, state, local and private fire service employees. There was no attempt to calculate costs associated with transfer or station, space etc
- **Costs of forgone natural resources**: salary of "militia" resources for the number of days away from their home office

Option 1—Current Organization (Non-NIMO)

Safety: Rated 3, was not rated higher due to fatigue factor for existing teams with back to back assignments, and spending time catching up when returning to home unit.

Land, Cultural and Resource Fire Management Objectives: Rated 0, current organization does a poor job of meeting the competing needs of all three (Land & Resource, Fire Program Management and Complex Incident Management). With 4634 volunteer militia committed each year to complex incident management, which is not accomplished.

Complex Incident Management Objectives: Rated 2, currently meets greater than 40% of the time, with many substitutions on the existing teams, competition for overhead among teams and statistics prove the number of existing teams are going down, can not meet all the needs of the future in this criteria.

Participation of non-fed agency resources: Rated 4, other agencies participate now for the overtime, and other moneys coming into those departments. Agencies participate because of experience, wildland fire expertise, and recognition. Generally, the current org. has about 25% participation from non-federal sources performance standards to measure the work.

Agency Acceptance: Rated 4, Staying with the status quo is comfortable

Meets needs of National Response Plan (NRP): Rated 2, the current is a wildland fire organization and is mobilized accordingly. With the current peak use in the summer, the current will do a poor job of meeting NRP request during the same time period. Current teams are effective with the assignments, but the efficiencies of the operations could be maximized with relationship development in Homeland Security Agencies, the time to do this now with current organizations is simply not available.

Leadership: Rated 2, the current organization is only partially meeting the leadership training needs of the existing IMTs and other fire program management needs because all come from the volunteer militia consequently no continuity in the program.

Option 2—Current number of IMTs with strong local T3 organizations and 3 year commitment (Non-NIMO)

Safety: Rated 4, higher score than current because T3 IMT organizations would be more successful in extended attack, thus potentially reducing mobilization of both T1 and T2 IMTs, additionally the transitions would be more effective with T3 IMT organizations.

Land, cultural and Resource and Fire Program Management Objectives: Rated 0, current organization does a poor job of meeting the competing needs of all three (Land & Resource, Fire Program Management and Complex Incident Management). With 4634 volunteer militia committed each year to complex incident management, that work is not accomplished.

Complex Incident Management Objectives: Rated 3, higher because of quality transitions, and development of pipeline of people to T1 and T2 IMTs from T3 IMT organizations.

Participation of non-federal agencies: Rated 4, same as Option 1.

Agency Acceptance: Rated 3 because the 3-year commitment and formal T3 IMT organizations will not be universally accepted by the agencies.

Meets needs of NRP: Rated 3 because of the use of T3 IMT organizations, NRP incidents at the local level would be effectively managed and the building blocks from T3 to T1 would become important in these incidents.

Leadership: Rated 3, with the changes in policy making volunteer militia more available, improvements to leadership training would be recognized but still limited due to the volunteer status us incident management personnel and lack of program continuity

Option 3—60 IMT's, consisting of 20-T1's and 40 T-2's with 30 full-time NIMO positions on each IMT.

Safety: Rated 4, because 60 full-time IMTs will be focused specifically on safety issues 100% of the time the rating is higher.

Land, Cultural and Resource Management Objectives: Rated 3, although less volunteer militia people will be available to stay home to accomplish work, over 1820 would now be available.

Complex Incident Management objectives: Rated 4, with full-time teams, this criterion will be accomplished most of the time. NIMO personnel would be available to provide quality training in complex incident management to future IMT members.

Participation of non-federal agencies: Rated 4, participation would increase with a need to fill 50% of support positions on IMTs.

Agency Acceptance: Rated 2, this approach is substantially different thus high level of agency resistance.

Meets needs of NRP: Rated 4, full-time teams would be staffed yearlong to meet NRP needs.

Leadership: Rated 5, with 1820 people who are full-time NIMO employees, leadership training to both IMTs and cadre for fire program management leadership training will be readily available.

Option 4—60 IMT's, 20 T-1's and 40 T-2's 50 IMTs with short team configuration (NIMO) on each IMT.

Safety: Rated 4, even though less full time number of people, with Command and General Staff positions filled, high emphasis on safety.

Land, Cultural and Resource Management Objectives: Rated 3, about the same as previous option.

Complex Incident Management objectives: Rated 4, same as previous option. NIMO personnel would be available to provide quality training in complex incident management to future IMT members.

Participation of non-federal agencies: Rated 4, high level of participation.

Agency Acceptance: Rated 3, this approach would still allow agency participation thus not a substantial change from the current situation.

Meets needs of NRP: Rated 4, full-time teams would be staffed yearlong to meet NRP needs.

Leadership: Rated 4, with 10 people per IMT, training would improve over the current system but reduced numbers of full-time NIMO personnel would provide less training opportunity.

Option 5—60 IMTs; 16 full time NIMO; 44 Type 2 IMTs entirely staffed and supported by Geographic Areas

Safety: Rated 4, 16 full time IMTs with high emphasis on safety.

Land, Cultural and Resource Management Objectives: Rated 3, about the same as previous option

Complex Incident Management objectives: Rated 5, this option provides the highest capability to meet this criterion. NIMO personnel would be available to provide quality training in complex incident management to future IMT members.

Participation of non-federal agencies: Rated 4, high level of participation.

Agency Acceptance: Rated 3, this approach would still allow agency participation thus not a substantial change from current situation.

Meets needs of NRP: Rated 4, 16 full-time teams would be staffed yearlong to meet NRP needs.

Leadership: Rated 5, with approximately 980 full-time NIMO personnel, all leadership needs will be met.

RANKING OF OPTIONS WITH EVALUATION CRITERIA

	1	2	3	4	5
Safety/risk management	3	4	4	4	4
Land/Resource Management	0	0	3	3	3
Meet F.P.M. objectives	2	3	4	4	5
Participation of non-federal agencies	4	4	4	4	4
SUB-TOTAL	**9**	**11**	**15**	**15**	**16**
Agency acceptance	4	3	2	3	3
Efficiently meet needs of the NRP	2	3	4	4	4
Facilitate accelerated leadership development for both complex Incident and Fire Program Management.	**2**	**3**	**5**	**4**	**5**
TOTAL	**21**	**24**	**34**	**34**	**34**

Evaluation scoring:

5 – Meets all evaluation
4 – Meets most >80%
3 – Meets most >60%
2 – Meets most >40%
1 – Meets some <20%
0– Does not meet

OPTION IMPLEMENTATION COSTS

OPTION	1	2	3	4	5
Cost to implement	$41.0	$41.0	$280.0	$146.0	$178.0
Costs of forgone natural resources	$123.0	$123.0	$43.0	$65.0	$51.0
Total cost	$167.0	($3.0)	$323.0	$211.0	$229.0
Net cost change above/below the current	0	0	$156.0	$44.0	$62.0

FISCAL STAFFING TOTALS/COMMITMENT

OPTION	**Cost/IMT**	**Total people**	**Days out NIMO**	**Days out VM/PSL**
1	**$2.99mm**	**6192**	**0**	**54**
2	**$2.52mm**	**7820**	**0**	**42**
3	**$5.38mm**	**5870**	**88**	**42**
4	**$3.52mm**	**5900**	**119**	**49**
5	**$3.82mm**	**5660**	**130**	**44**

Value of Remaining on the Home Unit

The Glossary succinctly defines Lands and Resource Management Objectives and Fire Program Management. In several options, several thousand people would remain on the home unit to accomplish both Land and Resource Management Objectives and complete Fire Program Management tasks. While each offer intangible values and in the past has been viewed as an illusive number, there are some "bottomline" numbers, which show the value of staying home.

Providing sound and professional advice in Land and Resource Management produces better Wildland Fire Situation Analysis' (WFSA) and certainly other land management decisions are made by people who understand the nuances and unique situations of the home unit. The value of remaining home and accomplishing the full-range of Fire Program Management duties can be quantified. Currently in the United States we are successful approximately 98% of the time with initial and extended attack. We spend the most moneys on the remaining 2% of the wildland fires. Some options create the opportunity to maximize availability on the home unit. If collectively the success ratio improved to 99% with initial and extended attack, a potential cost saving of 50% of the large fire costs could be realized. In the last three years the suppression costs have reached or exceeded $1 billion. Using a simplistic linear deduction model, the potential savings over the last three years would have been $500 million annually. Another example is taking the $ 1 billion figure and dividing the 2 percentage's by $1/10^{th}$ would potentially save $50 million for each $1/10^{th}$ percentage points gained by maintaining a strong initial and extended attack (including Type 5, 4 and 3 organizations) on the home unit. Another advantage is accomplishing fuels management project including both planning and implementation. Treating fire-adapted ecosystems is the long-term strategic solution but the same people staffing Incident Management Teams are the same people who are unavailable to accomplish the fuels portion of Fire Program Management.

CHAPTER SIX – GLOSSARY

AA – The **Agency Administrator** is the unit manager with responsibility for the unit for a federal or state agency, or local government.

AD – Term or acronym for **Administratively Determined**, which is used to calculate pay-rate for various positions and skills while engaged in incident management.

All-Risk (Non-wildland fire response) – Any incident management response for all activities other than wildland fire.

Complex – A complex is two or more individual incidents located in the same general proximity which are assigned to a single Incident Commander or Unified Command to facilitate management.

Complex Incident Management (CIM) – Management of a complex or the management of a major incident that includes multiple operational periods and usually more than 1000 personnel assigned. CIM may include the establishment of branches on the incident.

Federal Wildland Fire Reserve Program – A program to be developed that utilizes trained and qualified personnel that are no longer in the federal service that are willing to commit to availability for a prescribed period of time per year to meet emergency response position shortages. This model would be similar to the military reserve program.

Fire Program Management – Providing any of the following on an administrative unit: initial attack, extended attack, protection staffing, dispatch and coordination, seasonal severity planning, fuels management, aviation, fire prevention, detection, fire planning, WFSA development, and fire program budgeting on an administrative unit.

FTE (Full Time Equivilant) - One FTE equals 260 work days per year.

FUMT – Fire Use Management Teams provide skilled and mobile personnel to assist with the management of wildland fire use for cultural and resource benefits and prescribed fires.

GACCs – There are 11 **Geographic Area Coordination Centers** in the United States. The GACCs establish priorities, coordinate resource mobilization and serve as the Multi-Area Coordination (MAC) function until Preparedness Level 4 is reached in the Geographic Area. Due to their high incident management activity levels, the California Geographic Area and the Great Basin Geographic Area each have two GACCs.

Geographic Areas – There are nine Geographic Areas in the United States, consistent with the nine Forest Service Regions. Their primary responsibility is to coordinate fire-related activities within the geographical area.

Geographic Area Coordinating Groups – Are comprised of representatives of federal and state agencies and local government that oversee and facilitate the implementation of interagency standards developed at the national and geographic areas. There are nine Geographic Area Coordinating Groups.

Homeland Security Presidential Directive 5 – A directive signed by the President that directs all Departments and Agencies to work together to enhance the ability of the United States to manage domestic incidents.

Homeland Security Presidential Directive 7 – A directive signed by the President that directs all Departments and Agencies to identify and prioritize United States critical infrastructure and key resources and to protect them from terrorist attacks.

Homeland Security Presidential Directive 8 - A directive signed by the President that establishes policies to strengthen the preparedness of the United States to prevent and respond to threatened or actual domestic terrorist attacks, major disasters, and other emergencies by requiring a national domestic all-hazard preparedness goal, establishing mechanisms for improving delivery of Federal preparedness assistance to State and local governments, and outlining actions to strengthen preparedness capabilities of Federal, State and local entities.

Incident Complexity – When complexity levels exceed initial response capabilities, the appropriate Incident Command System positions should be added commensurate with the complexity of the incident. Based on an Incident Complexity Analysis, the Agency Administrator selects the appropriate management structure to provide for safe and efficient incident operations. Typically, incident complexity ranges from a Type 5 (least complex) through Type 1 (most complex).

IPA – Intergovernmental Personnel Act, which allows federal agencies to exchange employees with other state, federal, or local government agencies.

IMTs – Incident Management Teams are pre-identified within geographic areas—as well as nationally—to management complex incidents.

Land and Resource Management Objectives – The natural and cultural resources on public lands in the United States. Federal and state agencies are charged with protecting these resources, developing management plans, and implementing "best management practices" on these lands.

Long/Short IMTs – Incident Management Teams are configured either as a short team with Command and General Staff, or as a long team with Command or General Staff and all unit/group leader positions filled. The National Mobilization Guide defines both configurations.

MAC – Multi-Agency Coordination (or, in most instances, a **MAC Group)** exists full-time, but is generally formalized at Preparedness Level 4 or higher. Each Geographic Area has a MAC Group, as does the National Interagency Fire Center. Representation on MAC Groups is from the federal, state, and local governments. MAC Groups set priorities and allocate or re-allocate scare resources to incidents utilizing the coordination system to mobilize or re-allocate resources.

NIMO – National Incident Management Organization, also synonymous with the term Large Fire Suppression Organization. NIMO is an organization of full-time employees whose primary mission is complex incident management.

NRP – National Response Plan, managed by the Department of Homeland Security, which will replace the Federal Response Plan and.

NWCG – The **National Wildfire Coordinating Group** is comprised of representatives of federal and state agencies who provide a formalized system through which agreements may be reached on substantive issues in fire management

Private Wildland Fire Services: Any private sector entity including companies, organizations or individuals, who will provide services under a contractual agreement.

Rehire – A person who has left the federal or state government (through retirement) who returns to work either through the Administratively Determined (AD) pay scale, or returns to the previous grade and earns the difference between the retirement annuity and the current pay scale.

Rehired Annuitant – A person who has left the federal government and returns at the previous grade and is paid the current pay scale with no penalty to the retirement annuity.

Service First - Presidential authority which authorizes the Bureau of Land Management and Forest Service to delegate duties, responsibilities and authorities; thereby allowing an employee of either agency the authority to act in full force and effect of the other agency

Shoulder Season - That period of time from October 1st until June 1st of each calendar year which are the months of least utilization of Incident Management Teams

occur, or approximately 25% of all mobilizations for the entire calendar year occur during this time frame. The peak time (75%) of IMT mobilization is June through September.

Type 3-5 Incident Management Organizations – Organizations pre-identified for initial and extended attack operations, ranging from the Type 3 to Type 5 complexity incident. The Type 5 incident includes two to six personnel; a Type 4 complexity incident has an Incident Commander and either a single module to several resources; a Type 3 complexity incident has an Incident Commander, some or all command and general staff positions and resources that vary from several resources to several task forces/strike teams. This standard has been established as policy for each complexity level and can be found in the Interagency Fire Operations Handbook, Chapter 10, Incident Management.

Volunteer militia System – Utilizing personnel with full or part-time positions other than full-time complex incident management in federal or state agencies to staff complex incident management organizations.

CHAPTER SEVEN – LITERATURE REVIEW AND ANALYSIS

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CHAPTER EIGHT – TEAM MEMBERS

National Incident Management Organization
Management Options Team

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Co-Chair and National Wildfire Coordinating Group Liaison
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PAUL HEFNER
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Forest Fire Staff, Humbolt/Toyiabe National Forest

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CHAPTER NINE – APPENDICES

Appendix A

Needs Analysis Objectives

We propose that the National MAC Group Objectives or Goals to be met for the number of Interagency Type I and Type II IMT's and Area Command Teams be based on the data from the Needs Analysis developed in January of 2004 by the NIMO Study Task Group and are:

- To have no IMT's or Area Command Team or support overhead assigned more than 60 days per year on incidents 80% of the years over a ten year period.

- To meet the maximum number of Interagency IMT's and Area Command Teams needed at one time 80% of the time over a ten year period.

For example in 2003, using the total number of days assigned, 76 IMT's would be required to meet the maximum of 60 days assigned commitment. Five of the last 10 years the 60 day commitment would have been exceeded using the current number of 51 teams.

If we had 65 Incident Management Teams we would meet both objectives in 8 of the past 10 years.

From the 2004 Needs Analysis, 75% of team use for the past 10 years falls between June 1 and October 1.

Efficiency assumptions:

1. With the development and emphasis on the local type 3 team concept, it can be assumed that efficiencies will be gained and total yearly day commitment to incidents will be reduced if the following standards are established and followed.

    - Type 1 and 2 Interagency IMT's will be released and replaced by type 3 teams when the complexities both current and predicted could be accomplished by a type 3 team.

    - Type 2 teams will only be used when actual and predicted complexity indicates.

- The training and rapid deployment of type 3 teams is essential to the success rate of incident containment or efficient transition to a type 1 or 2 team.

- Type 3 teams are managed at the local interagency subgeographic level.

- The number of established type 3 teams is commensurate with historical subgeographic workload.

2. Pre planning of the following actions could "bank" IMT days for use during the latter part of the season.

   - Pre set rules of engagement and use needs to be established with Canada for the use of their IMT's. These teams could be used in June and July in projected severe seasons to bank days for later in the summer.

   - Pre set rules of engagement and use needs to be established with states that have their own IMT program. Most of these teams are in CA, OR and NC. These teams could be used outside of the core season to again bank Interagency IMT days for later use.

   - The proposed Federal and State Wildland Fire Agency Reserve Program could be used to organize and establish "serge IMT's for use if the problem comes up of needing more than 65 IMT's at one time.

Paul, Mike Edrington will forward an updated version of this to you next week.

Type II IMT Wildland Fire

	Total days	Total assign.	Ave days / assign
2003	2573	177	15
2002	1813	156	12
2001	1534	131	12
2000	2445	193	13
1999	1121	105	11
1998	723	73	10
1997	356	27	13
1996	2306	186	12
1995	707	58	12
1994	2654	207	13

Type II IMT non Wildland Fire

2003	314	14	22

2002	59	3	20
2001	26	3	9
2000	0	0	0
1999	29	3	10
1998	41	5	10
1997	58	4	15
1996	20	2	10
1995	99	8	12
1994	100	5	20

Total use Type II IMT's

2003	2887	191	15
2002	1872	159	12
2001	1560	134	12
2000	2445	193	13
1999	1150	108	11
1998	764	78	10
1997	414	31	13
1996	2326	188	12
1995	808	66	12
1994	2754	212	13
10 yr av	1698	136	12

Area Command Wildland Fire and non Willand Fire

2003	263	10	26
2002	182	11	17
2001	46	3	15
2000	297	10	30
1999	58	2	29
1998	34	1	34
1997	42	3	14
1996	84	5	17
1995	0	0	0
1994	113	6	19
10 yr av	111	5	20

THREE YEAR ROLLING AVERAGE - NUMBER OF DAYS OUT PER TEAM

	TII IMT's	TI IMT's
2001-2003	60	73
2000-2002	56	70
1999-2001	49	52
1998-2000	42	47
1997-1999	22	23

1996-1998	33	33
1995-1997	33	26
1994-1996	56	52

Note - time was added for transitions and travel times to length of assignments
Note - NPS all ris all Risk IMT assingments were not added in per NPS dir
Note - FMU workload was not added to the Type II figures as we had number of assignments but not le
The number of assignments are: 94=1,95=1,96=8, 97=4, 98=7, 99=5, 00=10, 01=20, 02=25, 03=20

Appendix B

Process to Determine Team Days Assigned

The following describes the process used to determine pure NIMO days used during the shoulder season and the VM/CSL/NIMO IMT days during the core season for Options 3, 4 and 5.

- 10 year average number of IMT assignments = 196.
- 10 year average length of IMT assignments = 14 days.
- 10 year average of 25% (49) assignments are in the shoulder season.
- 10 year average of 75% (147) assignments are in the core season.

EXAMPLE

- 49 shoulder assignments X 120 people / team X 14 day assignments = 82,320 people days.

  82,320 person days = ***46 days*** for each NIMO employee
  1800 NIMO employees

- 147 core season assignments X 120 people / team X 14 day assignments = 246,960 people days

- 246,960 person days = ***42 days*** for each NIMO/VM/CSL employees
  5850 total employees

Appendix C

Implementation Strategy

A listing of objectives are provided to facilitate the transition from the current organization to the NIMO options identified. Although the objectives may vary in each option there is a common thread that weaves through each.

Common Objectives:

1. Transitions must be complete within a maximum of 12 to 24 months.

2. Consideration to less than full implementation of any option could be undertaken commensurate with budget and IMT qualification limitations.

Option 1: Continue with existing system and policies. We do not recommend spending any additional time here. It is not working now and will not work in the future based on information in this report.

Option 2:
- Revise agency policies to require strong local interagency T3 IMT organizations (3 months).
- Revise agency policy to require minimum 3-year commitment to incident management (3 months). This will be the easy portion of the option; the difficult portion of policy action will be to instill a cultural change that incites the desire of employees/supervisors to want to participate. Cultural changes will take several years to accomplish.
- Develop standards and recruit personnel for T3 organizations with strong local government participation (Geographic Areas and Local units). (6 months)
- Complete all actions within 12 months.

Option's 3,4, and 5:
- Identify, recruit and assign key leadership positions for NIMO organization (6 months).
- Develop position descriptions, performance standards and selection criteria for IMT positions (6 months).
- Develop a long term (3-5 year) recruitment plan for filling NIMO vacancies.
- Staffing for NIMO employees in these options will come from existing federal, state agencies and private wildland fire contractors. These positions will be "backfilled" through norma recruitment processes for the agencies.
- Identify funding strategies from within and outside the agencies to include potential funding source from agencies such as DHS (6 months).
- Identify incentives for NIMO partners from State and local government agencies (3 months)

- Identify whom the NIMO personnel will work during the inception period (1 month). Suggest the Chair of he National MAC during this inception period but determine long term reporting relationships (6 months)
- Revise agency policy to require minimum 3-year commitment to incident management (3 months). This will be the easy portion of the option; the difficult portion of policy action will be to instill a cultural change that incites the desire of employees/supervisors to want to participate. Cultural changes will take several years to accomplish.
- Revise current training frequency to provide pre-requisite training for future IMT members (12 months).
- Develop policies, procedures and standards and "Service First" rules or other applicable rules of engagement that would fully use all federal, state and local agencies of operation for NIMO (12 months).
- Recruit and fill NIMO positions (In stages over 3 years)
- Complete all actions within 36 months.

Non-fire activities are value added fro the NIMO options:
Options 3-5 will provide NIMO activation and the development of this organization. It is expected that the teams and personnel assigned to NIMO could spend 100 days on emergency assignments throughout the year leaving 120 days for other activities. Internal team training activities will be a priority to further advance skills of the participants. NIMO personnel will be the highest skilled and qualified from all agencies and will use this expertise in mentoring, training, team development and advancing the skills of type 2 and 3 organizations. These Type 2 and 3 organizations will provide a continuing pool of apprentice applicants for NIMO vacancies. The NIMO skills in team activity will also be a valuable asset to other governmental agencies in their development of teams to meet internal needs and DHS requirements.

Because of a high skill level in fire and other resource discipline skills[1] NIMO personnel will provide an array of special skills in fire and fuels management, environment assessments, NEPA compliance. They will also be available for implementation of fuels and land management activities.

Agencies annually participate on multiple committees and work groups throughout the year. NIMO personnel will be highly skilled and qualified and could replace key agency personnel as subject matter experts of many of these committees. Expertise would also be loaned to field evaluation of equipment and other technology development projects.

[1] As an overall value added to the agencies Resource Management personnel will make up part of the NIMO organization. Resource Management people will bring the skills of their discipline to NIMO.